
United States District Court
District of New Jersey

UNITED STATES OF AMERICA : HON. ESTHER SALAS
v. : **CRIMINAL COMPLAINT**
REGINALD ESTRADA and : Magistrate No. 11-7042
MICHAEL ROSE

I, David Brodie, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about March 27, 2011, at Newark Liberty International Airport, in the District of New Jersey and elsewhere, defendants, REGINALD ESTRADA and MICHAEL ROSE:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B

David Brodie
Special Agent
Department of Homeland Security, HSI

Sworn to before me and subscribed in my presence,

March 28, 2011 at Newark, New Jersey
Date City and State

Honorable Esther Salas
United States Magistrate Judge

Signature of Judicial Officer

ATTACHMENT A

did knowingly and willfully conspire and agree with one another and others to commit offenses against the United States, that is, knowingly and intentionally import into the United States from a place outside thereof, namely Panama, 500 grams or more of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 952(a) and 960 (b)(2)(B),

in violation of Title 21, United States Code, Section 963.

ATTACHMENT B

I, David Brodie, am a Special Agent of the Department of Homeland Security, Homeland Security Investigations. Based upon my investigation and my discussions with other individuals involved in this investigation, I have knowledge of the following facts:

1. On or about March 27, 2011, a confidential informant ("CI") arriving at Newark Liberty International Airport ("NLIA") from Panama City, Panama was discovered to be in possession of approximately 2.3 kilograms of a white powdery substance, which field-tested positive for the presence of cocaine, concealed in the CI's suitcase.

2. The CI explained to law enforcement, in substance and in part, that the CI had been hired to courier controlled substances from Panama into the United States. The CI further stated, in substance and in part, that the CI was supposed to deliver the controlled substance to individuals who were picking the CI up at NLIA and would pay the CI for the courier service. The CI agreed to participate in a law enforcement-controlled delivery to these individuals.

3. The CI placed a consensually-recorded telephone call to defendant REGINALD ESTRADA, telling him that the CI would be finished with the immigration process shortly.

4. Defendants ESTRADA and MICHAEL ROSE were thereafter observed to be waiting for the CI in the NLIA terminal.

5. Defendant ESTRADA met the CI and accompanied the CI to defendant ESTRADA's sport utility vehicle, which was parked in the NLIA parking lot.

6. Defendant ESTRADA took the CI's luggage and began to load it into defendant ESTRADA's sport utility vehicle while the CI began to enter the vehicle. Defendant ROSE was located in the vehicle at this time. Law enforcement then took all three individuals into custody.

7. Defendant ROSE was discovered to have \$1,945 in currency organized in three bundles on his person.

8. Defendants ROSE and ESTRADA were each discovered to have two cellular telephones on his respective person. One of defendant ESTRADA's cellular telephones was the device that the CI called to contact ESTRADA during the consensually-recorded phone call.